

Capito, Bonnie P CIV NAVFAC Lant

From: Cole, Linda L CIV NAVFAC MidAtlantic
Sent: Monday, May 15, 2006 8:10 AM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: ARF - FW: CAX - Draft Technical Memorandum Pre-Removal Characterization of Sediments
Attachments: RTC to VDEQ Site 1 TechMemo.pdf

Please add to ARF for CAX Site 1. Thanks!!!

Linda

-----Original Message-----

From: Mary S. Anderson [mailto:msanderson@mbakercorp.com]
Sent: Friday, May 12, 2006 15:38
To: Cole, Linda L CIV NAVFAC MidAtlantic; Greyson Franklin; Ivester, Marlene; Joiner, Don; Miller, Debra; Wright, Jennifer H CIV NAVFAC Lant
Cc: Malinowski, John; Wojdak, Heather Governor
Subject: Re: CAX - Draft Technical Memorandum Pre-Removal Characterization of Sediments

Afternoon all,

Attached please find a response to VDEQ's comments on the CAX Site 1 Draft Technical Memorandum for the Pre-Removal Characterization of Sediments.

Time has been set aside at the next partnering meeting (Tues May 16th at 1500) to discuss and resolve comments and to finalize the cleanup goals. The eco-subgroup also has a call scheduled for Monday, May 15th to discuss the goals. The outcome of that call will be reported out to the team on Tuesday.

Have a good weekend,
Mary

>>> "Miller,Debra" <damiller@deq.virginia.gov> 5/1/2006 5:05 PM >>>

Hi, all.

The VDEQ has completed its review of the subject document. Our comments are attached (in Adobe .fdf format to import into the .pdf file). Additionally, I have included a comment summary. Please let me know if there are any questions or concerns. Have a good week all!

Debra A. Miller
Remedial Project Manager
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"You only need two tools; WD40 and Duct Tape. If it doesn't move and should, use WD40. If it does move and shouldn't, use duct tape." - Email Joke

5/15/2006

Response to VDEQ Comments
Draft Technical Memorandum for the Pre-Removal Characterization of Sediments
Site 1 – Landfill Near Incinerator
Naval Weapons Station Yorktown, Cheatham Annex

The Draft Technical Memorandum for the Pre-Removal Characterization of Sediments at Site 1 – Landfill Near Incinerator at Naval Weapons Station Yorktown, Cheatham Annex was submitted for review on March 27, 2006. The Virginia Department of Environmental Quality (VDEQ) provided the following comments, in an email dated May 1, 2006. The report will be revised to incorporate these comments as noted in the responses below.

1. Page 2-1. Section 2.1. As an incinerator ash landfill, it seems that ash would be a main component of this landfill. Why is ash not listed as part of the contents? Was ash not exposed?

Response: Charred material, including clumps of ash and molten glass were noted in the Final Field Investigation Report for Site 1 (Baker, 1999). Ash was not noted in the Draft Closeout Report for the 2003 removal action (Bhate, 2006). This information will be added to the text of the document.

2. Page 2-2, Section 2.3. What was the acreage of the disturbed wetlands?

Response: Approximately 200 ft², based on Figure 2-2.

3. Page 2-3, Section 2.4. For my information, was this a human health based cleanup goal? Was the current PCB action-level for fish tissue (filet) of 50 ppb discussed with the selection of this PRG?

Response: The 1.0 ppm cleanup goal for PCBs in sediment was ecologically based. The goal was negotiated during a conference call on April 14, 2003, and was agreed to by the Team during the April 2003 partnering meeting. VDEQ's action level was not discussed during the selection process.

4. General Comment on PCBs - The VDEQ currently has a new PCB strategy that requires congener analysis for sites with PCBs and an aquatic pathway. Will this strategy be incorporated in future evaluation of this site? For more information, please see <http://www.deq.virginia.gov/fishtissue/pcbstrategy.html>.

Response: Future remedial actions at Site 1 will be risk-based and will include the evaluation of total PCBs. It is the Navy's understanding that VDEQ's PCB strategy is based on the total maximum daily load (TMDL) initiative, which is evaluated as a To Be Considered (TBC) criteria. As of May 2006, VDEQ's website does not list a proposed TMDL implementation plan for the York River or its tributaries and TMDLs are not listed for the York River in the State's Water Quality Management Planning Regulation (9 VAC 25-720). This issue will be evaluated as an Applicable or Relevant and Appropriate Requirement (ARAR) once the State promulgates TMDL guidelines or criteria for the York River and the York River TMDL Implementation Plan is finalized.

5. Page 4-8, Section 4.1.13. Why is no removal required for the "yellow" areas that are above the established cleanup goals? This does not make sense, if you are not going to cleanup to

your established goals, then maybe the goals need to be changed to what you actually plan on doing. Please clarify or provide further justification as to why exceedances less than 2 times the cleanup goal will not be removed.

Response: This issue was discussed during the April, 2006 partnering meeting. The existing goals are being reexamined and possibly revised, as determined by the ecological subgroup and the Partnering Team. The final report will be updated to include this information.

6. Table 2-1. The values for sediments are different than the PRGs provided in the 20 April 2006 email to the eco sub-group? What goals are to be used?

Response: Determination of the final goals will be discussed and finalized during the May 2006 partnering meeting. The final report will be updated to include this information.

7. Table 4-3. Please check as there are no PAH results for samples CX01SD97-00 or CX01SD98-00.

Response: Correct, the vegetated wetland was sampled based on one round of sample collection and two rounds of data analysis. The first round of samples (Round 1, inner grids around suspected hotspots) were collected and analyzed based on a 21-day turn. The second round of samples (Round 2, outer grids around Round 1 sample grids) were collected concurrently with Round 1 samples, but were extracted at the analytical laboratory and held pending the results of the Round 1 data. Round 2 samples were analyzed at specific locations and/or for specific chemical classes, as needed for additional spatial resolution of the Round 1 sample results, as indicated on Table 3-1. Round 2 samples CX01SD97-00, CX01SD98-00, and CX01SD104-00 were not analyzed for PAHs as their spatial extent was resolved with the Round 1 dataset. "NAs" and "Not Analyzed" footnotes will be added to the tables to clarify this.

8. Table 4-3. Please check - no PAH results for CX01SD104-00.

Response: Please see response #7.

9. Figure 2-2. The legend for the landfill removal is not on the figure (pink cross-hatch). Is the landfill removal within the pink line on the figure?

Response: Yes, this figure will be updated to indicate that the boundary of the landfill removal is defined by the pink line.